

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Review of the Commission's)	MM Docket No. 00-39
Rules and Policies)	
Affecting the Conversion)	
to Digital Television)	
)	

COMMENTS OF BELO

Belo, the parent company of the licensees of eighteen television broadcast stations serving approximately fourteen percent of the nation's television households,¹ hereby submits its comments in response to the Notice of Proposed Rule Making ("NPRM") released by the Commission on March 8, 2000 in the above-captioned proceeding concerning the progress of the conversion of our nation's television system from analog technology to digital television ("DTV").² Belo has long been an enthusiastic supporter of digital television and is fully committed to ensuring that this exciting and important technology is brought to the public as quickly as possible.

¹ Belo, through its wholly-owned subsidiaries, is the licensee of television stations WFAA-TV, Dallas, TX; KHOU-TV, Houston, TX; KING-TV, Seattle, WA; KONG-TV, Everett, WA; KMOV(TV), St. Louis, MO; WCNC-TV, Charlotte, NC; KGW(TV), Portland, OR; KOTV(TV), Tulsa, OK; WWL-TV, New Orleans, LA; WVEC-TV, Hampton, VA; KVUE-TV, Austin, TX; KENS-TV, San Antonio, TX; KMSB-TV, Tucson, AZ; WHAS-TV, Louisville, KY; KTVK(TV), Phoenix, AZ; KASW(TV), Phoenix, AZ; KREM-TV, Spokane, WA; and KTVB(TV), Boise, ID.

² See Review of the Commission's Rules and Policies Affecting the Conversion to Digital Television, Notice of Proposed Rule Making, MM Docket No. 00-39, FCC 00-83 (rel. Mar. 8, 2000) ("NPRM").

Accordingly, Belo urges the Commission to take prompt and decisive action to remove the two principal remaining obstacles to a successful DTV transition: the uncertainties surrounding consumer equipment interoperability and cable must-carry.

As the Commission's records will reflect, Belo was among a group of broadcast station owners with stations in the top ten markets who committed to an expedited 18-month construction schedule, pledging to commence DTV operations at WFAA-TV in Dallas by November 1, 1998. Belo not only met, but in fact exceeded, that commitment. WFAA-TV launched one of the first digital television operations in the country on February 27, 1998, pursuant to special temporary authority, and stepped up to full power operation shortly after receipt of a construction permit in June 1998. As a result of these efforts, on October 29, 1998, WFAA-DT was able to broadcast live in high definition the historic launch of the Space Shuttle carrying a crew including Senator John Glenn. In addition, on November 1, 1998, WFAA-DT began receiving digital feeds from the ABC Television Network with the broadcast of *101 Dalmatians*.

Belo's Houston station, KHOU-TV, began digital operations with reduced power on May 18, 1998 and soon thereafter completed construction of and began operations with its permanent digital facilities -- again before the promised November 1, 1998 date and more than six months ahead of the schedule established in the Commission's rules. A third Belo station, KING-TV in Seattle, also met the "early on" deadline, commencing digital operations in September 1998. Belo's KHOU-DT and KING-DT joined WFAA-DT in the landmark broadcast of the John Glenn Space Shuttle launch.

Today, a total of six Belo stations, including KMOV(TV), St. Louis; WCNC-TV, Charlotte; and KGW(TV), Portland, Oregon in addition to the company's Dallas, Houston, and Seattle outlets, are broadcasting DTV signals, and the remaining Belo stations will begin digital broadcasting on or before May 1, 2002. Belo has committed approximately \$138 million to fund its transition to digital television service.

In short, Belo -- like many fellow broadcasters -- has committed enormous resources to the implementation of digital service, has met all deadlines specified by the Commission and, in fact, has exceeded the agency's requirements by initiating service in its three largest markets far in advance of the date established in the transition timetable. Belo rightfully expected that the costly and difficult transition to digital service would be achieved on an inter-industry basis, by broadcasters working together with the cable industry, consumer electronics manufacturers, and program suppliers under Commission oversight. Belo has been on the air with DTV for two years now, waiting for the resolution of DTV/cable inter-operability issues, the availability of affordable cable-ready receivers, and the determination of digital cable carriage requirements. A recent agreement between the Consumer Electronics Association and the National Cable Television Association addressed direct connection technical standards and program guide issues and generated cautious optimism that cable-ready receivers may be available in 12 to 18 months. However, substantial questions remain to be resolved with respect to other equipment interoperability concerns as well as set labeling and copy protection, and the Commission has failed to come to grips with the question of cable carriage rights for DTV.

With respect to interoperability, it is worth noting that today consumers can interconnect their analog television sets, video recorders, set-top boxes and DVD players. And, importantly, cable-ready analog television receivers and VCRs are easily available. However, the same situation has not yet materialized for DTV.

Programming piracy concerns on the part of producers and distributors have delayed the development of digital interfaces among consumer DTV devices. Similarly, cable system operators have resisted the introduction of cable-ready digital sets, which would obviate the need for operator-controlled set-top boxes. Although Belo appreciates the Commission's efforts thus far to address the outstanding cable compatibility issues, we believe that the agency should provide more vigilant oversight of set manufacturers and cable operators to ensure that they reach a prompt resolution of these matters.

As for DTV must-carry, Belo and other broadcasters, as well as their cable system counterparts, are still awaiting a Commission decision, even though more than two years now has passed since the adoption of the DTV Standard and the digital table of allotments. The Commission long since missed its end-of-1999 target for issuing a decision. Meanwhile, only a handful of broadcasters have been able to obtain cable carriage for their DTV signals; most cable operators are unwilling to consider carriage in the absence of a Commission decision on the issue.

Aside from the basic carriage issue, moreover, other related questions of importance demand immediate agency attention. For example, if a program is broadcast in true HDTV, it is unclear whether a cable operator under DTV must-carry rules would be allowed to reduce the picture resolution to "standard definition." If a broadcaster instead uses a DTV channel to send multiple programs simultaneously, it

likewise is unclear whether the FCC will require cable systems to carry all or just one of those programs. The agency's inaction on these critical facets of must-carry is injecting needless uncertainty into the business plans of broadcasters and cable operators alike. The Commission has waited long enough for industry solutions to these problems. Further foot-dragging by the FCC with respect to carriage issues jeopardizes not only the good faith efforts of all the broadcasters who have applied for and built their DTV facilities, but also the public's interest in an expeditious and successful transition to DTV.

Finally, with regard to the DTV transmission standard, Belo urges the Commission to move cautiously and not take any action which might disrupt or delay the momentum beginning to build in the DTV marketplace. Belo believes that the Commission has adopted the best DTV broadcasting standard available for North America. Like all radio transmission systems, the FCC's DTV standard involves a set of trade-offs and, thus, cannot be optimized for every possible application. However, it is remarkably well-suited for its intended purpose -- to replicate and eventually replace NTSC broadcasting with DTV. And there is no reason to believe the DTV standard does not have the capacity for continued improvement and adaptation for a host of services. It also is based on the most thoroughly-tested television system ever. As the Commission notes in the NPRM, current indoor reception problems are the result of shortcomings in the first generation of DTV receivers, not the DTV standard itself. Belo is therefore confident that these early receiver problems will ultimately be resolved as manufacturers continue to show improvements with each new generation of receivers.

In summary, Belo believes that the FCC should maintain its focus on the critical issues of consumer equipment interoperability and digital must-carry, which we believe are impeding the entire DTV transition. At the same time, the agency should not allow itself to be distracted by anything – such as prematurely reexamining the existing DTV transmission standard – which would only needlessly disrupt and delay the digital conversion.

Respectfully submitted,

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